

May 10, 2021

Hon. Peggy Kuo  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

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Re: *NOVAGOLD Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK; Briefing Schedule for Motion to Compel

Dear Magistrate Judge Kuo:

Pursuant to Your Honor's April 26, 2021 directive, the parties have met and conferred on Defendant's assertion of the reporter's privilege but have been unable to come to an agreement on the application of the privilege. The parties have agreed to the below briefing schedule for a motion to compel:

- May 19, 2021 – NOVAGOLD to file its Motion to Compel;
- June 2, 2021 – JCAP to file its Response;
- June 9, 2021 – NOVAGOLD to file its Reply.

Respectfully,

/s/ Jonathan Rubenstein

Jonathan Rubenstein

*Counsel for Plaintiff NOVAGOLD Resources, Inc.*